

LAW OFFICE OF JOHN P. HUMPHREYS  
Attorneys for Defendants  
Safeway Trucking Corporation and East  
Coast CES Inc.

David I. Robinson (DIR 9047)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
LOUIS DREYFUS CORPORATION,

Plaintiff(s),

08-CV. 1899 (DAB)

-against-

MAERSK FREEMANTLE, her engines, boiler,  
tackle, etc., MS CONTESTE BERND  
BARTELS KG GMBH & CO., BERND  
BARTELS, A.P. MOLLER MAERSK A/S  
(MAERSK LINE), SAFEWAY TRUCKING  
CORPORATION and EAST COAST CES INC.,

ANSWER TO  
CROSS-CLAIM

Defendant(s).

-----X

Defendants, SAFEWAY TRUCKING CORPORATION and EAST COAST CES  
INC., for its Answer to the Cross-Claim of defendant MAERSK herein, alleges upon  
information and belief as follows:

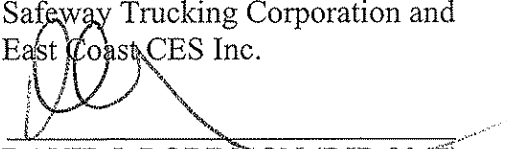
1. Denies each and every allegation as to Cross-Claim of defendant MAERSK.

WHEREFORE, Defendants SAFEWAY TRUCKING CORPORATION and EAST  
COAST CES INC., prays that the Cross-Claims against it be dismissed and that its Cross-  
Claim be granted, and that the Court may grant any such other or further relief as may be  
just and proper.

Dated: Melville, New York  
July 11, 2008

LAW OFFICE OF JOHN P. HUMPHREYS  
Attorneys for Defendants  
Safeway Trucking Corporation and  
East Coast CES Inc.

BY:

  
\_\_\_\_\_  
DAVID I. ROBINSON (DLR-9047)  
Office & P.O. Address  
3 Huntington Quadrangle, Suite 102S  
P.O. Box 9028  
Melville, NY 11747  
(631) 501-3100

TO:  
Kingsley, Kingsley & Calkins  
Attorneys for Plaintiff  
91 West Cherry Street  
Hicksville, NY 11801  
Attn: Harold M. Kingsley, Esq.  
(516) 931-0064

Freehill, Hogan & Mahar, LLP  
Attorneys for Defendant AP Moller Maersk (Maersk Line)  
80 Pine Street  
New York, NY, 10005  
Attn: James L. Ross, Esq.  
(212) 425-1900

MS Conteste Bernd Bartels KG GmbH & Co.  
Gross Hove 9  
21635 Jork  
Germany

STATE OF NEW YORK)  
:  
COUNTY OF SUFFOLK )

CHRISTINE ROTHBLATT, being duly sworn deposes and says:

That deponent is not a party to the action and is over the age of 18 years and that on the 11<sup>th</sup> day of July, 2008, deponent served the within ANSWER TO CROSS-CLAIMS upon:

Kingsley, Kingsley & Calkins  
Attorneys for Plaintiff  
91 West Cherry Street  
Hicksville, NY 11801  
Attn: Harold M. Kingsley, Esq.

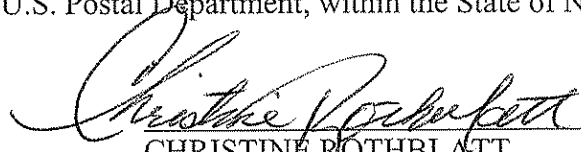
Freehill, Hogan & Mahar, LLP  
Attorneys for Defendant AP Moller Maersk (Maersk Line)  
80 Pine Street  
New York, NY, 10005  
Attn: James L. Ross, Esq.

MS Conteste Bernd Bartels KG GmbH & Co.  
Gross Hove 9  
21635 Jork  
Germany

COURTESY COPY (2)

Justice Batts  
Federal Court – United States District Court  
United States Courthouse  
500 Pearl Street, Rm. 2510  
New York, New York 10007

the address designated for such service, by depositing a true copy in an official depository under the care and custody of the U.S. Postal Department, within the State of New York.

  
CHRISTINE ROTHBLATT

Sworn to before me this

11<sup>th</sup> day of July, 2008

  
\_\_\_\_\_  
NOTARY PUBLIC

DAVID I. ROBINSON  
Notary Public, State of New York  
No. 02805074527  
Qualified in Nassau County  
Commission Expires 9/1/09

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

08-CV 1899 (DAB)

LOUIS DREYFUS CORPORATION,

Plaintiff,

-against-

MAERSK FREEMANTLE, her engines, boiler, tackle, etc., MS CONTESTE BERND  
BARTELS KG GMBH & CO., BERND BARTELS, A.P. MOLLER MAERSK A/S  
(MAERSK LINE), SAFEWAY TRUCKING CORPORATION and EAST COAST CES INC.,  
Defendants.

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*ANSWER TO CROSS-CLAIM*

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LAW OFFICE OF JOHN P. HUMPHREYS  
Attorneys for Defendant(s)  
SAFEWAY TRUCKING CORPORATION & EAST COAST CES INC.  
Office & P.O. Address  
3 Huntington Quadrangle, Suite 102S  
P.O. Box 9028  
Melville, New York 11747  
(631) 501-3100  
Facsimile (631) 501-3085 *(Not for Service)*

Matter No.: 0924181SAS

Claim No.: CBM2619

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TO:

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Service of a copy of the within

is hereby admitted.

Dated:

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Attorney(s) for

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**NOTICE OF ENTRY:**

**PLEASE TAKE NOTICE** that the within is a true copy of an order entered in office of the Clerk of the above Court on

**NOTICE OF SETTLEMENT:**

**PLEASE TAKE NOTICE** that the within proposed order will be presented for settlement and entry at the Courthouse on  
at 10:00 a.m. at the office of the Clerk of the Part of this Court where the within described motion was heard.

Dated: Melville, New York

THE LAW OFFICE OF JOHN P. HUMPHREYS  
Attorneys for Defendant(s)  
As Designated Above